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Counsel for Defendant Colter Energy Services, USA, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ADHAM ZAAROUR, Individually and On
Behalf of Others Similarly Situated,

Plaintiffs,

v.

COLTER ENERGY SERVICES, USA INC.,

Defendant.

Case No. 2:24-cv-00443-GMN-BNW

**STIPULATION EXTENDING
DEADLINE TO RESPOND TO
PLAINTIFF'S MOTION FOR
CONDITIONAL CERTIFICATION
(First Request)**

Plaintiff Adham Zaarour and Defendant Colter Energy Services USA Inc., by and through their counsel of record, hereby stipulate that Defendant's deadline to respond to Plaintiff's Motion for Conditional Certification, filed on March 12, 2024, shall be extended until April 16, 2024. In

1 support of this Stipulation, the Parties state as follows:

2 1. Pursuant to LR IA 6-1, Defendant states that is the first stipulation or request for
3 extension of time to file Defendant's response to Plaintiff's Motion for Conditional Certification.

4 2. On or about March 5, 2024, Plaintiff filed his Original Collective Action Complaint
5 and Jury Demand ("Complaint"). (Doc. 1).

6 3. On or about March 11, 2024, Plaintiff filed his Motion for Conditional Certification
7 Pursuant to 29. U.S.C. § 216(b) and Issuance of Court-Authorized Notice ("Motion for Conditional
8 Certification"). (Doc. 7)

9 4. On or about March 12, 2024, Defendant was served with, among other things, the
10 Summons, Complaint, and Motion for Conditional Certification.

11 5. In accordance with Fed. R. Civ. P. 12(a)(1), the deadline by which Defendant is
12 required to file an answer or otherwise plead in response to Plaintiff's Complaint is April 2, 2024.

13 6. The deadline by which Defendant is required to respond to Plaintiff's Motion for
14 Conditional Certification is currently identified on the Court docket as March 25, 2024. This
15 deadline has not yet expired.

16 7. Defendant seeks additional time to respond to Plaintiff's Motion for Conditional
17 Certification. If Defendant is required to respond by the current deadline of March 25, 2024,
18 Defendant will need to oppose a lengthy motion raising complex issues only thirteen days after
19 learning about the existence of this lawsuit and before Defendant's initial pleading is due. The
20 length and complexity of the motion, and the short time which Defendant has had to evaluate this
21 case and to arrange for its defense, constitute good cause for an extension of time to respond to the
22 Motion for Conditional Certification until April 16, 2024, which is two weeks after Defendant's
23 current deadline to file an answer or other response to the Complaint.
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1 8. Plaintiff does not oppose the requested extension.

2 9. This motion is not made for the purposes of delaying these proceedings, and no
3 party will be prejudiced if the relief sought in this Motion is granted.
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5 10. Pursuant to LR IA 6-1, Defendant states that it has not sought an extension of this
6 deadline previously.

7 WHEREFORE, Defendant Colter Energy Services USA Inc. respectfully requests an
8 extension of time to respond to Plaintiff's Motion for Conditional Certification, Plaintiff does not
9 oppose Defendant's request, and the parties therefore stipulate that Defendant shall respond to
10 Plaintiff's Motion for Conditional Certification by April 16, 2024.
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13 IT IS SO ORDERED:

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15 _____
16 UNITED STATES DISTRICT JUDGE

17 DATED: March 22, 2024
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20 *Counsel's Signatures Follow on Next Page*
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1 Dated: March 22, 2024

/s/ John T. Keating

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